REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claim 43 has been canceled. Claims 1-42, 44-45, and 48-52 are pending, of which claims 16 and 42 have been amended.

Applicant's amendments and remarks after Final are appropriate under 37 C.F.R. §1.116 because they address the Office's remarks in the Final Action, and thus could not have been presented earlier. In addition, the amendments and remarks should be entered to place the case in better form for appeal.

Allowable Subject Matter

Claims 26-41, 44-45, and 48-52 have been allowed (*Office Action* p.3). These claims remain unchanged and are in condition for allowance.

Applicant appreciates the indication of allowability. Applicant agrees with the Examiner's conclusions regarding patentability, without necessarily agreeing with or acquiescing in the Examiner's reasoning. In particular, Applicant believes that claims 26-41, 44-45, and 48-52 are allowable because the prior art fails to teach, anticipate, or render obvious the invention as claimed, independent of how the invention is paraphrased.

35 U.S.C. §103 Claim Rejections

Claims 1-25 and 42-43 are rejected under 35 U.S.C. §103(a) for obviousness over Patent No. JP 08085242 to Yoshihiro (hereinafter, "Yoshihiro"), in view of U.S. Patent No. 6,158,344 to Walker et al. (hereinafter, "Walker") (*Office Action* p.2). Applicant respectfully traverses the rejection.

Claim 1 recites a printing device comprising "an application component configured to determine a pen swath height error compensation factor from the pen swath optical densities", and "a print media line-feed advance offset configured to be calibrated corresponding to the pen swath height error compensation factor."

The Office recognizes that the prior art does not teach "offsetting a print media line-feed advance corresponding to the error compensation factor" as set forth in allowed claim 26 (*Office Action* p.4). Accordingly, claim 1 is allowable over the Yoshihiro-Walker combination because the references do not disclose "a print media line-feed advance offset configured to be calibrated corresponding to the pen swath height error compensation factor", as recited in original claim 1.

Additionally, Yoshihiro and/or Walker do not teach or suggest that a pen swath height error compensation factor is determined from pen swath optical densities, as recited in claim 1. The Office recognizes that Yoshihiro does not disclose a pen swath height error compensation factor determined from pen swath optical densities and thus, cites Walker (*Office Action* p.3). However, Walker does not determine the error compensation factor from pen swath optical densities, as recited in claim 1. Walker only describes that intervals between calibration marks are determined (*Walker* col.5, lines 8-57).

The Office cites Walker at col. 6, lines 30-37 which only describes that optical sensors are useful for measuring errors such as paper slippage and/or feed roller diameter inaccuracies. This cited section of Walker does not teach or suggest a pen swath height error compensation factor determined from pen swath optical densities, as recited in claim 1.

Accordingly, claim 1 is allowable over the Yoshihiro-Walker combination for at least the reasons described above, and Applicant respectfully requests that the §103 rejection be withdrawn.

Claims 2-15 are allowable by virtue of their dependency upon claim 1 (either directly or indirectly). Additionally, some or all of claims 2-15 are allowable over the Yoshihiro-Walker combination for independent reasons. For example:

Claim 11 recites that "the application component is further configured to average multiple pen swath optical densities to determine the pen swath height error compensation factor." Yoshihiro and/or Walker do not teach or suggest an average of multiple pen swath optical densities, as recited in claim 11. The Office cites the Yoshihiro abstract for disclosing that multiple pen swath optical densities are averaged to determine a pen swath height error compensation factor (*Office Action* p.3). However, the Yoshihiro abstract only describes that a test pattern is read by an image sensor, and based on the data, an optimum conveying condition of the recording paper is calculated. There is no indication in Yoshihiro that pen swath optical densities are determined or that optical densities are averaged, as described in claim 11.

Accordingly, claim 11 is allowable over the Yoshihiro-Walker combination and the §103 rejection should be withdrawn.

Claim 16 recites a printing device comprising "a sensor configured to detect pen swath optical densities from the printed diagnostic image", and "an application component configured to determine a pen swath height error compensation factor from the pen swath optical densities, and determine a print

media line-feed advance offset from the pen swath height error compensation factor."

As described above in the response to the rejection of claim 1, Yoshihiro and/or Walker do not teach or suggest that a print media line-feed advance offset is determined from a pen swath height error compensation factor, as recited in claim 16. Walker only describes that intervals between calibration marks are determined (*Walker* col.5, lines 8-57), and does not disclose that a print media line-feed advance offset is determined from pen swath optical densities, as the Office contends (*Office Action* p.3).

Accordingly, claim 16 along with dependent claims 17-25 are allowable over the Yoshihiro-Walker combination, and Applicant respectfully requests that the §103 rejection be withdrawn.

Claim 42 recites "calibrating a print media line-feed advance offset corresponding to the error compensation factor."

As described above in the response to the rejection of claim 1, the Office recognizes that Yoshihiro and/or Walker do not teach or suggest calibrating a print media line-feed advance offset corresponding to the error compensation factor, as recited in claim 42 (*Office Action* p.3). Further, Walker does not determine a compensation factor from pen swath optical densities, as recited in claim 42. Walker only describes that intervals between calibration marks are determined (*Walker* col.5, lines 8-57).

Accordingly, claim is allowable over the Yoshihiro-Walker combination and the §103 rejection should be withdrawn.

Conclusion

Pending claims 1-42, 44-45, and 48-52 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: Jan. 14, 2005 By: _____

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